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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10
11 In the Matter of the Statement of Issues
Against:

Case No. *2012-73*

12 **JESSICA ALVARADO**
13 **9640 Rimrock Road**
14 **Sonora, CA 95370-8025**

STATEMENT OF ISSUES

15 Applicant.

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17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Statement of Issues solely in
20 her official capacity as the Executive Officer of the Board of Registered Nursing, Department of
21 Consumer Affairs.

22 2. On or about September 27, 2010, the Board of Registered Nursing, Department of
23 Consumer Affairs received an application for a Registered Nursing license from Jessica Alvarado
24 (Applicant). On or about September 23, 2010, Jessica Alvarado certified under penalty of perjury
25 to the truthfulness of all statements, answers, and representations in the application. The Board
26 denied the application on March 28, 2011.

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1 SECOND CAUSE FOR DENIAL OF APPLICATION

2 (Committed Acts Which if Done by a Licentiate Constitute Cause for Discipline)

3 7. Applicant's application is subject to denial under Code section 480(a)(3)(A), in that
4 she committed acts which if done by a licentiate of the profession would constitute grounds for
5 suspension or revocation of a license under Code section 2761(a)(1) (unprofessional conduct,
6 incompetence, or gross negligence), as more particularly set forth above in paragraph 6.

7 PRAYER

8 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
9 and that following the hearing, the Board of Registered Nursing issue a decision:

- 10 1. Denying the application of Jessica Alvarado for a Registered Nursing;
11 2. Taking such other and further action as deemed necessary and proper.

12 DATED: 8-1-11

13 *Louise R. Bailey*
14 LOUISE R. BAILEY, M.ED., RN
15 Executive Officer
16 Board of Registered Nursing
17 Department of Consumer Affairs
18 State of California
19 Complainant

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